

TASHA PARIS CHALFANT (SBN 207055)  
TASHA PARIS CHALFANT LAW PC  
13620 Lincoln Way, Suite 325  
Auburn, California 95603  
Tel. (916) 444-6100  
Fax (916) 930-6093  
E-mail: tashachalfant@gmail.com

Attorney for Defendant  
JOSE JUAN CORONA

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:24-cr-0066 DAD
	)	
Plaintiff,	)	STIPULATION REGARDING
	)	EXCLUDABLE TIME PERIODS UNDER
v.	)	SPEEDY TRIAL ACT; FINDINGS AND
	)	ORDER
	)	
JOSE JUAN CORONA,	)	
	)	
	)	
Defendant.	)	

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorneys ROSS PEARSON and CAILY NELSON and the Defendant, JOSE JUAN CORONA, by and through his counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for a status conference on September 15, 2025, with time excluded to that date.

2. By this stipulation, the defendant now moves to reset the status conference to November 10, 2025, and to exclude time between September 15, 2025, and November 10, 2025, under Local Code T4. Plaintiff does not oppose this request.

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE

AND FOR EXCLUSION OF TIME

1           3.       The parties agree and stipulate, and request that the Court find the following:

2           a.       The government has represented that in addition to the PDF discovery associated  
3 with this case, the newly discovery forensic extractions is voluminous. All of this discovery has  
4 been either produced directly to counsel, and/or made available for inspection and copying.

5           b.       Counsel for Defendant JOSE JUAN CORONA needs the time to review the new  
6 discovery, consult the guidelines and conduct investigation in order to decide whether to set the  
7 matter for trial. Multiple issues have come into play which have caused a delay and Mr. Corona  
8 requests additional time. The lack of funding for CJA providers has made processing and analyzing  
9 discovery more difficult, especially with the forensic extractions. Although counsel is under an  
10 ethical obligation to continue to provide representation while not being compensated, her providers  
11 are not. Further, counsel recently tried to meet with her client to discuss important issues on the  
12 case and learned Mr. Corona had not been provided his diabetic medication for 5 days (a total of  
13 10 doses were missed). My client was in no condition to review discovery and discuss guidelines  
14 and we need additional time to do so. (Counsel worked with the US Marshals and the Sacramento  
15 Main Jail and they assure me that Mr. Corona has been given his medication.)

16           c.       Counsel for the defendant believes that failure to grant the above-requested  
17 continuance would deny her the reasonable time necessary for effective preparation, taking into  
18 account the exercise of due diligence.

19           d.       The government does not object to the continuance.

20           e.       Based on the above-stated findings, the ends of justice served by continuing the  
21 case as requested outweigh the interest of the public and the defendant in a trial within the original  
22 date prescribed by the Speedy Trial Act.

23  
24  
25  
26  
27  
28                   STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
                                  AND FOR EXCLUSION OF TIME

f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of September 15, 2025, to November 10, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

All counsel has reviewed this proposed order and authorized Tasha Paris Chalfant to sign it on their behalf.

IT IS SO STIPULATED.

Dated: September 10, 2025 by: /s/Tasha Paris Chalfant for  
ROSS PEARSON  
CAILY NELSON  
Assistant U.S. Attorneys  
Attorneys for Plaintiff

Dated: September 10, 2025 by: /s/Tasha Paris Chalfant  
TASHA PARIS CHALFANT  
Attorney for Defendant  
JOSE JUAN CORONA

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME

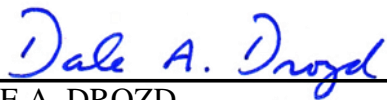
**ORDER**

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, September 15, 2025, to and including November 10, 2025, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the vacated status conference shall be reset on November 10, 2025, at 9:30 a.m.

IT IS SO ORDERED.

Dated: September 11, 2025

  
\_\_\_\_\_  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE  
AND FOR EXCLUSION OF TIME